

DENTONS US LLP
Nicholas B. Janda (SBN 253610)
nick.janda@dentons.com
601 South Figueroa Street, Ste 2500
Los Angeles, California 90017-5704
Tel:(213) 623-9300
Fax:(213) 623-9924

Norman M. Aspis (SBN 313466)
norman.aspis@dentons.com
4655 Executive Drive, Suite 700
San Diego, CA 92121
Telephone: (619) 699-2574

Monica B. Richman (*pro hac vice*)
Monica.richman@dentons.com
Daniel A. Schnapp (*pro hac vice*)
daniel.schanpp@dentons.com
Mary Kate Brennan (*pro hac vice*)
Marykate.brennan@dentons.com
1221 Avenue of the Americas
New York, New York 10020-1089
Tel: (212) 768-6700
Fax: (212) 768-6800

Attorneys for Plaintiff

MORGAN, LEWIS & BOCKIUS LLP
Benjamin B. Anger (SBN 269145)
ben.anger@morganlewis.com
600 Anton Boulevard Suite 1800
Costa Mesa, CA 92626-7653
Tel: +1.714.830.0600
Fax: +1.714.830.0700

Joshua M. Dalton (*pro hac vice*)
josh.dalton@morganlewis.com
One Federal Street
Boston, MA 02110-1726
Tel: +1.617.341.7700
Fax: +1.617.341.7701

Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

DAYBREAK GAME COMPANY LLC

Plaintiff,

vs.

KRISTOPHER TAKAHASHI;
ALEXANDER TAYLOR; Does 1-20,
Inclusive

Defendants.

Case No. 25-CV-01489-BAS-BLM

**JOINT MOTION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

1 Pursuant to Local Rules 7.2 and 12.1, Defendants Kristopher Takahashi and
2 Alexander Taylor (“Defendants”) and Plaintiff Daybreak Game Company LLC,
3 respectfully submit this Joint Motion to Extend Time to Respond to the Complaint,
4 requesting that the Court extend Defendants’ deadline to answer, move, or otherwise
5 respond to the Complaint until and through August 15, 2025. In support of this
6 Motion and to show good cause, the Parties state as follows:

7 1. On June 14, 2025, Plaintiff filed their Complaint herein.

8 2. On or about June 18, 2025, Plaintiff caused the Complaint to be
9 personally served on Defendants Kristopher Takahashi and Alexander Taylor.

10 3. Defendants and their counsel are investigating the allegations of
11 Plaintiff’s Complaint and require additional time to prepare their response to
12 Plaintiff’s Complaint.

13 4. This is Defendants’ first request for an extension of time. This
14 request is not made for the purpose of delay, or for any other improper purpose.
15 Neither party would be unduly prejudiced by the brief extension sought by this
16 Motion.

17 5. Counsel for Defendants has conferred with counsel for Plaintiff,
18 and Plaintiff has consented to an extension of Defendants’ deadline to answer,
19 move to dismiss, or otherwise respond to Plaintiff’s Complaint to August 15,
20 2025.

21 6. No scheduling order has been entered in this case, and no other
22 deadlines will be affected by the requested extension. The Parties agree that this
23 extension shall not be deemed to constitute a waiver of any rights, defenses,
24 objections or any other application to any Court that any party may have with
25 respect to the claims set forth in the Complaint.

26 THEREFORE, for good cause, the Parties jointly move the Court to
27 extend the deadline for Defendants to answer, move, or otherwise respond to the
28 Complaint to August 15, 2025 and respectfully request that the Court sign the

1 proposed order submitted concurrently herewith pursuant to Civil Local Rule
2 7.2.

3
4 Dated: July 17, 2025

MORGAN, LEWIS & BOCKIUS LLP

5
6 By: s/ Benjamin B. Anger

7 Benjamin B. Anger
ben.anger@morganlewis.com

8 Attorney for Defendants,
9 Kristopher Takahashi and
10 Alexander Taylor

11
12 Dated: July 17, 2025

DENTONS US LLP

13
14 By: s/ Nicholas B. Janda

15 Nicholas B. Janda
nick.janda@dentons.com

16 Attorney for Plaintiff,
17 Daybreak Game Company LLC

18
19 **SIGNATURE ATTESTATION**

20 In compliance with Section 2(f)(4) of the Electronic Case Filing
21 Administrative Policies & Procedures Manual, I hereby attest that each of the
22 attorneys on whose behalf this filing is being submitted concurs in the filing's
23 content and has authorized the filing.

24
25 By: s/ Benjamin B. Anger